

McGREGOR W. SCOTT
United States Attorney
WILLIAM S. WONG
JASON HITT
Assistant U.S. Attorneys
501 I Street, Ste 10-100
Sacramento, CA 95814
Telephone (916) 554-2790

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA)	
)	CR. NO. S-99-433-WBS
Plaintiff,)	
)	
v.)	STIPULATION AND ORDER
)	
SON VAN NGUYEN, et al.,)	
)	
Defendant.)	DATE: June 21, 2006
)	TIME: 10:00 a.m.
)	CTRM: Honorable William B. Shubb

The United States of America, through its counsels of record, McGregor W. Scott, United States Attorney for the Eastern District of California, and William S. Wong and Jason Hitt, Assistant United States Attorneys; defendant Son Van Nguyen, through his counsel, James R. Greiner, Esq.; defendant Thongsouk Lattanaphon, through his counsel, Jeffrey Staniels, Assistant Federal Defender; and defendant Hoang Ai Le, through his counsel, Michael Long, Esq.; stipulate and agree to the following revised motion schedule and exclusion of time under the Speedy Trial Act:

1. Government's response to defendants' motions to be filed on November 22, 2006;
2. Defendants' reply, if any, to be filed by December 6, 2006; and

3. Hearing on the motions December 13, 2006, at 10:00 a.m.

In light of pending jury trials and heavy caseloads, counsels for the government needs additional time to research and prepare its responses to the defendants' motions. Accordingly, the parties stipulate that time be excluded for the pendency of these motions pursuant to 18 U.S.C. § 3161(h)(1)(F) - delay resulting from any pretrial motion and 18 U.S.C. § 3161(h)(8)(B)(ii) - additional time to adequately prepare for pretrial proceedings.

Respectfully submitted,

McGREGOR W. SCOTT
United States Attorney

DATED: June 20, 2006

By: /s/ William S. Wong
WILLIAM S. WONG
Assistant U.S. Attorney

DATED: June 20, 2006

By: /s/ William S. Wong authorized by
JAMES R. GREINER for defendant
Son Van Nguyen

DATED: June 20, 2006

By: /s/ William S. Wong authorized by
JEFFREY STANIELS, AFD, for
defendant Thongsouk Lattanaphon

DATED: June 20, 2006

By: /s/ William S. Wong authorized by
MICHAEL LONG for defendant
Hoang Ai Le

ORDER

For the reasons set forth above, the revised law and motion schedule set forth above is adopted. This Order does not affect defendant John That Luong's renewed motion for severance and separate trial on counts one through three or defendant John That Luong's motion to dismiss counts one through nine of the indictment for failure to allege the elements of the offenses charged, which motions will be heard on June 20, 2006 as scheduled. The court

1 finds excludable time to December 13, 2006 for the reasons set forth
2 above.

3
4 DATED: June 20, 2006

5 

6 WILLIAM B. SHUBB

7 UNITED STATES DISTRICT JUDGE
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28